

FLEISCHMAN BONNER & ROCCO  
ATTORNEYS AT LAW LLP

81 MAIN STREET • SUITE 515 • WHITE PLAINS • NEW YORK • 10601  
TEL: 908-337-1426 • FAX: 908-516-2049 • WEB: [WWW.FBRLLP.COM](http://WWW.FBRLLP.COM)

EMAIL: [PRocco@fbrllp.com](mailto:PRocco@fbrllp.com)

March 2, 2022

**BY ECF**

The Honorable Brian M. Cogan  
U.S. District Court for the Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: *Force, et al. v. Qatar Charity, et al.*, No. 1:20-cv-02578-BMC**

Dear Judge Cogan:

We write pursuant to Rule I.E.1 of the Court's Individual Practices to request extensions of Plaintiffs' and Defendants' briefing deadlines in connection with Defendants' pending motions to dismiss (ECF 55, 56, 57). Plaintiffs' opposition to Defendants three separate motions is currently due on March 11, 2022; Defendants' replies are due one week later on March 18, 2022. *See* Feb. 28, 2022 and Mar. 2, 2022 Minute Orders. With the consent of all parties, Plaintiffs request the following extension of those deadlines: **March 25, 2022 for Plaintiffs' opposition; April 8, 2022 for Defendants' replies**. These deadlines reflect Plaintiffs' consent to Defendants' request for 14 days (rather than the 7 days in the current schedule) to file their reply to Plaintiffs' opposition. Aside from the briefing schedule for the motions to dismiss, no other dates or deadlines have been scheduled in this action.

At the pre-motion conference on January 28, 2022, the Court granted Defendants a second extension of their deadlines to respond to the Complaint, allowing them until February 14, 2022. *See* Nov. 29, 2021, Jan. 4, 2022 and Feb. 28, 2022 Minute Orders. The Court set February 28, 2022 (two weeks later) as a tentative deadline for Plaintiffs' opposition. *See* Transcript of Jan. 28, 2022 Hearing at 31:2-13. On February 17, 2022, Plaintiffs sought to extend that deadline to March 31, 2022 (45 days after Defendants served their motions). *See* ECF 60 at 6. On February 28, 2022, the Court denied Plaintiffs' request and entered the current briefing schedule. *See* Feb. 28, 2022 Minute Order.

We appreciate that the Court is anxious to move this action forward without further delay. However, we respectfully submit that the current March 11, 2022 deadline for Plaintiffs' opposition is unexpectedly short and, in light of Plaintiffs' counsels' deadlines in other cases, not conducive to the best presentation of issues that are of great importance to our clients. The three Defendants have filed three separate briefs totaling 118 pages consisting of largely uncoordinated arguments. Requiring Plaintiffs' counsel to respond to those motions in just 26 days (on the current schedule) puts Plaintiff at a disadvantage given the extensive amount of time the three Defendants had to prepare their submissions. The Court has been liberal in extending Defendants' deadlines to respond to the Complaint: granting Qatar National Bank and Masraf al Rayan an additional 77 days (for a total of over 3 months), and Qatar Charity an additional 35 days (for a total of just under 2 months). By contrast, Defendant now seek a total of 39 days to respond to



Honorable Brian M. Cogan  
March 2, 2022  
Page 2

Defendants' motions, which is only a 25-day extension of the two-week default deadline under Local Civil Rule 6.1(b).

For the foregoing reasons, we respectfully request the Court issue an order extending the deadline for Plaintiffs' opposition from March 11, 2022 to **March 25, 2022**, and the deadline for Defendants' replies from March 18, 2022 to **April 8, 2022**.

Respectfully submitted,

*/s/ Patrick L. Rocco*

Patrick L. Rocco

CC: All counsel of record (via ECF)